

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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THE CONFEDERATION OF NORTH, CENTRAL:  
AMERICAN AND CARIBBEAN ASSOCIATION : No. 1:17-CV-02304 (WFK) (SMG)  
FOOTBALL, :  
: Plaintiff, : DECLARATION OF DAVID CRUZ  
: : IN SUPPORT OF PLAINTIFF'S  
- against - : INQUEST FOR DAMAGES,  
: ATTORNEY'S FEES, AND PRE-  
AUSTIN JACK WARNER, THE ESTATE OF : AND POST-JUDGMENT INTEREST  
CHARLES BLAZER, ELIZABETH MANZO, :  
ESQ., Administrator CTA, substituted as parties on :  
behalf of CHARLES BLAZER, :  
SPORTVERTISING (NY), SPORTVERTISING :  
(CAYMAN), EN PASSANT LTD., EN :  
PASSANT INC., MULTISPORT GAMES :  
DEVELOPMENT INC., :  
: Defendants.  
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I, DAVID CRUZ, being duly sworn, deposes and says:

1. I am the Head of Finance at The Confederation of North, Central American and Caribbean Association Football ("CONCACAF"). The statements contained herein are based upon my personal knowledge, and based on my review of CONCACAF's financial documents and CONCACAF's other books and records maintained in the ordinary course of business. I respectfully submit this Declaration in Support of Plaintiff's Memorandum of Law in Support of Plaintiff's Inquest for Damages, Attorneys' Fees, and Pre- and Post-Judgment Interest.

2. I hold a Bachelor's of Science from the University of Miami and a Masters of Business Administration in Finance from Nova Southeastern University.

3. I have been employed with CONCACAF since July 1, 2013. I initially held the position of Finance Supervisor, until I was promoted to Finance Manager in March 24, 2014. I served in that role until January 1, 2016, when I was promoted to my current position.

4. My role includes such responsibilities as setting and designing the budget for CONCACAF, generating and analyzing cash projections, overseeing member association expenses, managing the accounting software used. I am responsible for managing the chart of accounts for coding expenses, as well as assist with the supervision of other finance employees who handle invoice processing for accounts payable and accounts receivable. I have held these responsibilities since I joined CONCACAF, but as I have been promoted my management responsibilities have increased.

5. I worked with every aspect of CONCACAF's accounting and financial systems, including the historic accounting information that was utilized by CONCACAF during the time period 1996-2012. During those years, CONCACAF used the QuickBooks accounting software for its general ledger and other accounting functions.

6. CONCACAF's Executive Committee established an Integrity Committee in 2012 to investigate and report to the Executive Committee on the facts surrounding several allegations of corruption involving Austin "Jack" Warner and Charles ("Chuck") Blazer, the former President and Secretary of CONCACAF, respectively (the "CONCACAF Integrity Committee Investigation" or the "Investigation"). As part of the Investigation, among other things, the Integrity Committee was tasked with identifying the total amount of compensation received by Blazer, including compensation that was unauthorized by CONCACAF. The CONCACAF Executive Committee also retained BDO to assist with the Investigation by providing forensic accounting services and assisting with the collection and preservation of evidence, including with

regard to Blazer's compensation. The Executive Committee also retained BDO to assist with the investigation by providing forensic accounting services and assisting with the collection and preservation of evidence.

7. The documents provided to BDO during the course of CONCACAF's investigation were financial records, including electronic records, maintained in the ordinary course of business. These included providing access and copies of CONCACAF's QuickBooks general ledger, CONCACAF's financial documents, CONCACAF's bank statements, including the checks sourced from the bank statements, as well as other wire transfer and payment records. I have reviewed the QuickBooks screenshots and canceled checks that are attached to the affidavit submitted by BDO in support of CONCACAF's Damages Inquest evidence, and they are true and accurate copies of screenshots and canceled checks maintained by CONCACAF as part of its financial records in the ordinary course of business.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated: New York, New York  
July 2, 2019



David Cruz  
David Cruz